

Dugan, Brett

From: (b) (6) (b) (6)
Sent: Friday, April 07, 2017 1:48 PM
To: AirQuality
Subject: Comments regarding Class 1 Air Quality designation

I would like to provide you with my point of view regarding the proposed redesignation from Class 2 to Class 1 air quality categories. Although we should constantly strive to improve the condition of our entire environment, I feel this change imposes restrictions reaching far beyond the simple discharge limits of present facilities and resources. Regardless of where you draw boundary lines, this is a Federal Standard, to be upheld. If limits (present or proposed) are exceeded, steps would be absolutely mandated to correct the situation. Just one example: Let's say Ponderay Newsprint decided to put in a Co-Gen Plant, so they could generate electricity, rather than drawing on Hydroelectric power at their present rate. More water then becomes available, to flush and support our continued efforts to improve Salmon movements and habitat. But wait...Co-Gen, as studies show, creates air discharges. Sorry, no Co-Gen for Ponderay Newsprint. Instead of looking at the big picture, we choose tunnel vision and come up with untenable solutions. (Like...yes, you can have Co-Gen, but you have to shut down half of your production, so as not to exceed present discharges). So who "won" there?

Your latest fact sheet, addressing many public concerns, also reiterates that existing practices are "Grandfathered", with present levels of SO₂, NO_x, Particulates, etc. being acceptable. However, as a Federal Standard and classification, if particulate matter exceeds Class 1 margins, required steps are mandated, and cannot be shoved aside. Without digressing into the whole original study that looks into a very large region, (Most of which it also states doesn't apply to our unique geographic area), the bottom line is that accurate measurement of air quality in a Class 1 area dictates everything that has effect on that designated area. So, it would be virtually impossible to ignore any factors that would take the Class 1 area out of compliance. By Law, steps would be required, to bring all discharges back down, to stringent Class 1 levels. These specific steps would not be dictated by the Federal Government, unless we did not come back into compliance to the Class 1 Standards. Initially, it would be US who decides what activities to limit or shut down. Would that be Logging? Travelling dirt roads? Shutting down 200+ local jobs, and the tax base they pump up? Restricting vehicle travel, or setting up emission testing? Etc.

It would be in our hands, to try to achieve the new, much more restrictive standards. Are we choosing to ignore the releases of Hanford radioactivity into our air and water? Some of that has a half-life of 250,000 years! Bottom line for me: I feel that our present Class 1 designation is restrictive enough to support quality of life in Pend Oreille County. Once again, I recognize any efforts to improve our habitat. I also think that the present systems within that classification allows accommodations for growth, a supportive tax base, employment, as well as leeway for adapting what we do to improve present air quality. Stepping into a much more restrictive designation disallows the freedom to weigh what we choose to do, and also relinquishes our ability to govern our very unique geographic region. Thank you. (b) (6)